

During the course of a two week study in the Commonwealth of PA, 13 PSAP's reported 4182 non-initialized 9-1-1 phone calls. Only 1.5%, 65 of the 4182 the non-initialized calls resulted in legitimate 9-1-1 emergencies requiring dispatch of first responders. In addition, several PSAP's reporting in this study provided specific information of incidents where law enforcement action resulted from the abuse of a non-initialized phone. A brief summary follows:

Over a two week period the City of Allentown PA PSAP received an unbelievable amount of calls from one specific unregistered cell phone. The calls began, and ended almost precisely the same time every day. The calls would start shortly after 1500hrs and end near 1700hrs and were only received Monday thru Friday. It was not uncommon to receive 30 or more calls each day, during that two hour period. From the beginning the PSAP realized it was children, a boy and a girl. Each call would last up to a few minutes. Everything from singing, yelling, cursing, story telling, mimicking back the dispatcher, and general horseplay would be heard. There were some specifics... "Help, 911", "Send the Police"... etc., but no specifics as to an address or problem were ever given. After two weeks of this, one of the dispatchers had the girl (probably about 5 years old) on the line and asked her for her phone number, the little girl didn't give it but asked the dispatcher for her phone number. The dispatcher gave her a phone number, and then asked the girl for her number again. This time she gave it. As she was giving it, the boy (brother, about 12) could be heard clearly in the background yelling "NOOOOOOO"! The PSAP used the number, reached their mother on the second ring, who clearly had no idea they had been playing with "911" for two weeks. She also had no idea a "dead, unsubscribed" cell phone could call 911. Allentown sent an officer to verify everything was OK

Second incident, Allentown PSAP, Juvenile male caller on an unregistered cell phone calling 9-1-1 and reporting he is being raped. Was talking like he is a girl. With assistance from the wireless carrier, the PSAP tracks the caller to him down to a house on the east side and with some assistance from the wireless carrier he is located and taken into custody for false calls. Several

hours of 9-1-1 Center and local police effort spent on this incident.

Jefferson County PA:

On Sunday, April 27, Jefferson County 9-1-1 received approx 20 calls and on Monday, April 28, dispatchers processed 100+ cellular 9-1-1 calls in an 8 hour shift. All of these calls were from cell phone number 814-590-8584. When the dispatchers would answer the call, the caller had already disconnected and all they would hear is a busy signal. When a call-back was attempted, it would ring once then divert to a fast busy signal. Some call-backs would result in a Verizon recording asking if you would like to add minutes to the phone. All calls were from the same Verizon cell tower and sector. Dispatchers were unable to re-bid to obtain Phase II data. This as you could imagine not only created an inconvenience to the dispatchers, but more importantly a potential safety issue when all dispatchers were committed to fielding this large call volume.

Contact was made with the Verizon Wireless NOC in an effort to obtain account information. They advised this phone number was from a prepaid phone and they had no name or address registered. The PSAP Director was informed this was a "phone out of the box" that can be purchased at retailers such as Wal-Mart, K-Mart, etc. The NOC advised me that even if the subject would add minutes to the phone, Verizon does not obtain any personal information nor is required by law to obtain this information. Verizon Wireless advised the PSAP director if this was a problem, "take it up with your local senator.

With the non-initialized phone, a caller is limited to 9-1-1 only, with this situation, any criminal, terrorist, etc can freely have the benefit of standard cellular phone communications and there is no record of an account or who the phone number is registered to. In the day and age of increased homeland security and vigilance, this issue further compounds the non-initialized phone issue.

I did conduct some research into the procedure of activating a

Verizon prepaid. An individual can literally take the phone from the box, charge it, input a specific activation #, input their zip code and the phone produces a standard cellular phone number! This seems to be the standard, as some other carriers I have spoken to follow a similar procedure. The County 9-1-1 Center filed an incident report with the Pennsylvania State Police, no resolution as of this filing.

Tioga County, PA:

Concurrent with the 9-1-1 Goes to Washington activities, this rural PSAP began receiving calls from a non-initialized phone. 700 calls later and with the assistance of local law enforcement, two brothers were arrested on the same day this issue was presented to the FCC.

Should you have any questions on this comment filing, please do not hesitate to contact me.

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